

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

**FRACTUS, S.A.**

**Plaintiff,**

**vs.**

**SAMSUNG ELECTRONICS CO., LTD., et  
al.**

**Defendants.**

**HONORABLE LEONARD DAVIS**

**Civil Action No. 6:09cv203**

**JURY TRIAL DEMANDED**

**PLAINTIFF'S OBJECTIONS & COUNTER DESIGNATIONS TO  
DEFENDANTS HTC  
INFRINGEMENT TRIAL DEPOSITION DESIGNATIONS**

**I. OBJECTIONS**

**1. 30(b)(6) Deposition of Jaume Anguera, Volume I, taken on December 3, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
7:15-23	Incomplete
14:11-18	FRE 402, FRE 403, MIL
25:11-15	
25:25-26:04	
106:22-107:17	FRE 402, FRE 403, MIL
107:14-108:17	FRE 402, FRE 403, MIL
109:1-109:13	FRE 402, FRE 403, MIL
110:14-110:18	FRE 402, FRE 403, MIL
110:22-110:23	FRE 402, FRE 403, MIL
140:13-141:4	FRE 402, FRE 403, MIL
153:25-154:2	
163:11-164:18	FRE 402, FRE 403, MIL
192:9-13	

**2. Deposition of Jaume Anguera, taken on December 4, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
244:24-245:9	FRE 402, FRE 403, MIL 11
246:19-247:4	FRE 402, FRE 403, MIL 11
247:14-248:8	FRE 402, FRE 403, MIL 11
248:23-250:10	FRE 402, FRE 403, MIL 11
251:25-252:7	FRE 402, FRE 403, MIL 11
252:17-253:19	FRE 402, FRE 403, MIL 11
254:14-17	FRE 402, FRE 403, MIL 11
266:7-267:25	FRE 402, FRE 403, MIL 11
271:1-7	FRE 402, FRE 403, MIL 11
275:16-278:4	275:16-276:7 FRE 402, FRE 403, MIL 1 & 9; 276:8-278:4 FRE 402, FRE 403, MIL 11; 278:2 not testimony
280:10-281:24	FRE 402, FRE 403, MIL 1 & 9
284:16-285:1	FRE 402, FRE 403, MIL 1 & 9
286:8-21	FRE 402, FRE 403, MIL 1 & 9
287:20-288:17	FRE 402, FRE 403, MIL 1 & 9
289:4-24	FRE 402, FRE 403, MIL 1 & 9
296:5-22	FRE 402, FRE 403
305:16-306:1	
306:8-10	
306:15-17	
309:4-16	
310:17-19	
325:13-326:25	FRE 402, FRE 403, MIL 11
327:6-10	FRE 402, FRE 403, MIL 9
372:6-14	FRE 402, FRE 403, MIL 9
372:19-25	FRE 402, FRE 403, MIL 9
373:15-20	FRE 402, FRE 403, MIL 11
374:5-15	FRE 402, FRE 403, MIL 11
374:20-375:6	FRE 402, FRE 403, MIL 11

**3. 30(b)(6) Deposition of Carmen Borja Borau, Vol. 1 and Vol. 2, taken on December 6 and December 7, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
7:14-16	Incomplete
382:15-384:4	FRE 402, FRE 403

**4. 30(b)(6) Deposition of Carles Puente Baliarda taken on December 8, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
7:11-13	
9:7-11	
184:8-19	FRE 402; FRE 403
186:13-187:20	FRE 402, FRE 403
188:12-20	FRE 402, FRE 403, 188:15-19 request to repeat question
198:24-199:1	
201:1-7	
201:14-202:18	
203:1-7	
203:10-14	
203:21-207:12	
207:17-21	
209:24-211:8	FRE 402; FRE 403; MIL 210:22 not testimony

**5. Deposition of Carles Puente Baliarda, Volume I, taken on December 9, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
7:24-8:3	
124:15-23	FRE 402; FRE 403; MIL
128:14-129:10	
260:14-261:10	FRE 402, FRE 403, 260:23-25 not testimony

**6. Deposition of Carles Puente Baliarda, Volume II, taken on December 10, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
312:16-314:14	FRE 402; FRE 403
315:11-24	FRE 402; FRE 403; Incomplete
316:5-13	FRE 402; FRE 403
318:19-319:1	FRE 402; FRE 403
319:10-321:4	FRE 402; FRE 403
321:17-22	
324:5-325:20	FRE 402; FRE 403; 325:9-13 request to repeat question
326:25-327:23	FRE 402; FRE 403
329:12-330:18	FRE 402; FRE 403
331:16-20	
332:5-17	FRE 402; FRE 403
333:13-334:10	FRE 402; FRE 403; 333:22 – 334:1 request to repeat questions
334:19-335:13	FRE 402; FRE 403; Incomplete
351:1-18	Incomplete
355:6-13	
363:13-18	
364:14-365:13	
365:20-366:25	FRE 402; FRE 403; 366:9-12 not testimony
367:8-369:23	FRE 402; FRE 403

**7. 30(b)(6) Deposition of Christopher Marshall taken on November 23, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
7:6-10	
11:17-13:10	Incomplete
14:4-22	
15:17-16:10	
21:7-22:4	
24:13-25:3	Incomplete
25:18-29:12	
30:3-33:19	
34:1-14	
36:11-38:6	
38:13-21	
44:5-45:11	
47:16-49:7	

**8. 30(b)(6) Deposition of Ruben Bonet, Volume I, taken on December 9, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
11:15-12:7	
197:25-204:3	FRE 402, FRE 403, MIL; 201:10-202:3, 202:9-12, 203:23-204:3 FRE 802; 204:2 not testimony
211:25-212:25	212:10-16, 212:21-25 FRE 402, FRE 403, MIL
216:12-218:1	216:16-217:25 FRE 402, FRE 402, MIL; 217:15-20 FRE 802;
221:4-14	FRE 402, FRE 403, MIL, FRE 802
239:23-240:17	240:5-17 FRE 402, FRE 403, MIL, FRE 802; 240:16 not testimony
359:10-24	FRE 402, FRE 403, MIL
361:6-20	FRE 402, FRE 403, MIL
362:3-4	FRE 402, FRE 403, MIL
364:9-17	FRE 402, FRE 403, MIL
366:18-367:7	
368:8-20	

**9. 30(b)(6) Deposition of Ruben Bonet, Volume II, taken on December 10, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
401:18-402:11	FRE 402, FRE 403, MIL
404:3-15	FRE 402, FRE 403, MIL
434:12-435:3	FRE 402, FRE 403, MIL, 434:19 not testimony
437:1-437:17	FRE 402, FRE 403, MIL
455:7-465:5	455:7-458:21 FRE 402, FRE 403, MIL, FRE 608; 458:22-463:12 FRE 402, FRE 403; 463:17-23, 464:9-10 not testimony;
478:15-483:8	478:15-23, 479:12-483:8 FRE 402, FRE 403, MIL; 478:24-479:10 not testimony;

**10. Deposition of Ruben Bonet taken on December 10, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
10:17-24	
11:23-13:2	12:7-25 FRE 802
33:18-38:1	FRE 402, FRE 403, MIL; 36:18 not testimony
49:5-52:5	FRE 402, FRE 403, MIL; 49:5-23, 50:7-23, 51:6-19 FRE 802; 51:11 not testimony
75:2-11	
77:23-79:15	FRE 402, FRE 403, MIL
79:17-24	FRE 402, FRE 403, MIL
86:16-18	
86:20	
86:22-88:21	FRE 402, FRE 403, 87:3-88:21 calls for a legal conclusion
88:24-25	FRE 402, FRE 403, calls for a legal conclusion
93:13-94:21	
95:1-97:2	FRE 402, FRE 403, MIL
104:19-106:2	FRE 402, FRE 403, MIL; 104:24-106:2 FRE 608, FRE 802
121:20-123:17	FRE 402, FRE 403, MIL; 123:7-13 FRE 802
129:22-131:4	FRE 402, FRE 403, FRE 802
131:9-132:6	FRE 402, FRE 403, FRE 802
134:22-135:3	FRE 402, FRE 403, FRE 802
135:5-136:11	FRE 402, FRE 403, FRE 802, MIL

**11. Deposition of Torbjorn Folkebrant taken on December 16, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
9:7-19	
10:20-11:17	
13:12-15:3	FRE 402, FRE 403, MIL
29:8-30:9	FRE 402, FRE 403, MIL
30:18-31:15	FRE 402, FRE 403, MIL 30:18-31:8 FRE 802
32:17-33:1	FRE 402, FRE 403, MIL
118:4-119:13	
133:3-136:16	FRE 402, FRE 403, MIL, 134:8-136:16 FRE 802
144:7-10	

144:22-145:15	
145:25-146:24	FRE 402, FRE 403, MIL 145:13-16; 145:25-146:24 FRE 802

**12. 30(b)(6) Deposition of Angel Garcia taken on December 3, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
9:5-14	
13:22-15:11	
49:8-19	
58:2-59:8	58:8-59:8 FRE 402, FRE 403, MIL
108:4-110:14	110:12-14 FRE 402, FRE 403, MIL
127:7-18	FRE 402, FRE 403, MIL
153:13-156:17	FRE 402, FRE 403
156:21-158:3	FRE 402, FRE 403
158:8-162:15	FRE 402, FRE 403
176:13-23	FRE 402, FRE 403, MIL
177:1-14	FRE 402, FRE 403, MIL
177:16-22	FRE 402, FRE 403, MIL
177:24	FRE 402, FRE 403, MIL
178:1-179:12	178:1-11 FRE 402, 403, MIL
179:18-21	
179:23-180:4	
183:15-25	FRE 402, FRE 403, MIL
184:3-185:9	FRE 402, FRE 403, MIL
204:18-205:11	204:18-24 FRE 402, FRE 403, MIL
205:24-206:25	FRE 402, FRE 403, MIL

**13. Deposition of Angel Garcia taken on December 4, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
81:3-102:10	FRE 402, FRE 403, MIL 98:25-99:12, 99:20-100:2, 100:4-102:10 FRE 802
121:3-8	FRE 402, FRE 403, MIL
122:13-16	FRE 402, FRE 403, MIL
123:4-7	FRE 402, FRE 403, MIL
125:3-5	FRE 402, FRE 403, MIL
125:7-23	FRE 402, FRE 403, MIL
133:21-23	FRE 402, FRE 403, MIL
133:25-138:1	FRE 402, FRE 403, MIL
138:10-15	FRE 402, FRE 403, MIL

138:3-8	FRE 402, FRE 403, MIL
144:13-145:13	FRE 402, FRE 403, MIL; 144:24-145:5 FRE 802
145:15-22	FRE 402, FRE 403, MIL
149:20-150:16	FRE 402, FRE 403, MIL; 150:1-160 FRE 802
160:13-161:2	FRE 402, FRE 403, MIL
161:6-24	FRE 402, FRE 403, MIL
162:1-11	FRE 402, FRE 403, MIL
162:13-13	FRE 402, FRE 403, MIL

**14. 30(b)(6) Deposition of Jordi Ilario taken on December 5, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
213:8-216:11	Incomplete
250:9-252:5	
270:10-272:3	FRE 402, FRE 403, FRE 602, FRE 104(b)

**15. 30(b)(6) Deposition of Vincent Pluvinaige (Intellectual Ventures) taken on March 15, 2011**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
6:13-15	
9:6-16	
33:2-24	
34:6-13	
34:25-35:20	34:25-35:2 FRE 402, FRE 403
36:3-21	
37:5-38:9	37:19-38:9 FRE 402, FRE 403, FRE 802
42:25-43:23	43:9-23 FRE 402, FRE 403, FRE 802
45:25-46:10	FRE 402, FRE 403
46:16-22	FRE 402, FRE 403
56:5-24	FRE 402, FRE 403
57:9-18	FRE 402, FRE 403
58:19-23	FRE 402, FRE 403
81:1-82:6	81:10-82:6 FRE 402, FRE 403
83:13-88:12	FRE 402, FRE 403; 85:1-5, 85:13-86:10 FRE 802

**16. 30(b)(6) Deposition of Josep Mumbru taken on December 7, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
7:2-23	
109:24-111:16	111:16 not testimony
111:19-112:15	
113:8-13	113:13 not testimony
113:25-114:8	114:8 not testimony
115:18-119:14	116:3-10; 117:7; 118:5; 118:9 not testimony

**17. Deposition of Dwight L. Jaggard taken on August 27, 2010**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
6:9-17	
9:9-22	
10:10-16	FRE 402; FRE 403
14:4-10	
14:21-15:1	
20:2-4	
20:15-19	
21:23-22:11	
24:11-15	
24:19-22	
126:18-127:7	FRE 402; FRE 403; MIL 1 Incomplete
127:19-21	
224:7-10	
224:15-226:2	
226:8-10	
226:12-18	
228:2-4	
228:6-13	
231:11-14	
231:16-232:6	

**18. Deposition of Dwight L. Jaggard, Volume I, taken on March 8, 2011**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
51:8-24	FRE 402; FRE 403; Incomplete
52:15-17	FRE 402; FRE 403
52:23-53:25	FRE 402; FRE 403
55:6-18	FRE 402; FRE 403
56:19-57:3	FRE 402; FRE 403
57:5-6	FRE 402; FRE 403
57:18-58:5	FRE 402; FRE 403
68:2-9	FRE 402; FRE 403
68:25-69:8	FRE 402; FRE 403
205:10-206:11	
210:10-14	FRE 402; FRE 403; MIL 3
211:23-212:14	FRE 402; FRE 403; MIL 3
213:22-214:11	FRE 402; FRE 403; MIL 3 Incomplete
214:19-215:7	FRE 402; FRE 403; MIL 3
216:22-217:19	FRE 402; FRE 403; MIL 3

**19. Deposition of Dwight L. Jaggard, Volume II, taken on March 9, 2011**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
384:14-16	
384:18-23	
385:3-13	Incomplete
393:7-15	
411:7-412:13	
412:19-413:5	
457:4-19	Incomplete
506:2-10	FRE 402; FRE 403

**20. Deposition of Warren Stutzman, Volume II, taken on March 4, 2011**

<b>Defendants' Designations Page/Line</b>	<b>Plaintiff's Objections to Defendants' Designations</b>
432:10-434:24	
436:14-437:8	FRE 602, FRE 104(b)
437:9-438:24	FRE 602, FRE 104(b)
462:8-22	
436:14-19	
471:14-473:9	
473:11-474:1	Incomplete
481:9-14	
481:15-20	
485:3-22	
486:11-486:15	
495:8-18	
496:6-14	
497:17-498:2	
498:4-18	
498:20-499:4	
500:7-501:15	FRE 104(b), FRE 602
502:12-19	
504:13-21	
514:15-516:7	FRE 402, FRE 403, FRE 602, FRE 104(b), 514:23, 515:6, 515:13, 516:6 not testimony
516:9-24	FRE 402, FRE 403, FRE 602, FRE 104(b), 516:6, 516:13, 516:20-24 not testimony
517:22-518:1	FRE 402, FRE 403, FRE 602, FRE 104(b) 517:25 not testimony

**II. COUNTER DESIGNATIONS**

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
JAUME ANGUERA – 12/3/2010**

<b>From</b>			<b>To</b>	
<b>Page</b>	<b>Line</b>		<b>Page</b>	<b>Line</b>
7	15		8	1
110*	9		110	18
153	14		153	21

**\*Conditional per SFC Patents**

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
JAUME ANGUERA – 12/4/2010**

From			To	
Page	Line		Page	Line
245*	10		246	18
250	11		250	18
253*	20		254	1
260	1		260	11
261	12		261	17
265	5		265	12

**\*Conditional**

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
30(B)(6) RUBEN BONET – 12/9/2010**

From			To	
Page	Line		Page	Line
197	5		197	7
197	9		197	24
364	18		364	20
365	10		365	11
365	13		365	14

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
30(B)(6) RUBEN BONET – 12/10/2010**

From			To	
Page	Line		Page	Line

From			To	
Page	Line		Page	Line
437	18		439	22
465	7		467	4

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
RUBEN BONET – 12/10/2010**

From			To	
Page	Line		Page	Line
13	3		13	17
38	2		38	8
132	7		132	14

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
CARMEN BORJA – 12/6/2010**

From			To	
Page	Line		Page	Line
7	11		7	25

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
TORBJORN FOLKEBRANDT – 12/15/2010**

From			To	
Page	Line		Page	Line
12	25		13	3
15	22		16	13

From			To	
Page	Line		Page	Line
145	13		145	16
145	25		146	25

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
30(b)(6) ANGEL GARCIA – 12/3/2010**

From			To	
Page	Line		Page	Line
110	15		110	16
110	18		110	23
182	20		183	14
207	5		209	10

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
30(b)(6) ANGEL GARCIA – 12/4/2010**

From			To	
Page	Line		Page	Line
123	16		125	18
123	20		125	2

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
JORDI ILARIO – 12/5/2010**

From			To	
Page	Line		Page	Line
216	12		217	3

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
DWIGHT JAGGARD, PhD – 08/27/2010**

From			To	
Page	Line		Page	Line
20	5		20	14
22	12		22	14
127	22		128	2
226	19		227	9
227	11		227	23
227	25		228	1
228	14		229	17
229	19		229	23

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
DWIGHT JAGGARD, PhD – 03/08/2011**

From			To	
Page	Line		Page	Line
51	25		52	2
52	4		52	14
54	20		55	5
214	12		214	18
289	19		290	24

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
DWIGHT JAGGARD, PhD – 03/09/2011**

From			To	
Page	Line		Page	Line
385	14		385	21
456	19		457	3
481	1		481	13
482	25		483	15
505	16		506	1

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
CHRISTOPHER MARSHALL – 11/23/2010**

From			To	
Page	Line		Page	Line
13	13		13	19
24	21		24	26
29	1		29	21
45	12		46	6
81	2		81	19
81	21		81	24
82	2			
82	5		82	11
82	14			
82	18		82	22
83	1			
83	3		83	7
83	9		83	15
83	17			

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Page	Line		Page	Line
83	20		83	23
84	2		84	3
84	5		84	9
84	12		84	14
84	16			
84	19		84	20
84	22			

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
VINCENT PLUVINAGE –3/15/2011**

From			To	
Page	Line		Page	Line
56	25		57	8
44	5		45	22
49	15		50	1
89	13		89	19

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
CARLES PUENTE – 12/10/2010**

From			To	
Page	Line		Page	Line
315	25		316	4
335	14		335	20
351	19		351	20

**DEPOSITION EXCERPTS FROM  
DEPOSITION TESTIMONY OF  
WARREN STUTZMAN – 3/3/2011**

From			To	
Page	Line		Page	Line
185	21		187	5

Dated: April 14, 2011

Respectfully submitted,

By: /s/ Genevieve Vose

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 14th day of April, 2011 with a copy of this document via the Court's CM/ECF system per Local Rule CD-5(a)(3).

/s/ Genevieve Vose

Genevieve Vose